

BRUNDAGE

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September 17, 2002

NEPA Task Force
PO Box 221150
Salt Lake City, UT
84122
FAX: (801) 517-1021

Dear NEPA Task Force:

This is a letter of comment on the NEPA process and "analysis paralysis."

The Brundage Mountain Company operates the Brundage Mountain Ski Area, a mid-sized resort on the Payette National Forest in West Central Idaho. We have read the excellent letter from NSAA dated 7/31/02 on this subject and agree with the comments concerning shortcomings and recommendations for improving the process. We are also glad that CEQ is taking an interest in this matter that is of major importance to us as well as many other resorts.

Brundage is currently experiencing a great deal of frustration with the NEPA process in connection with our plans for expanding facilities at the resort. Four years ago we engaged the services of Sno.engineering to revise our Master Development Plan and prepare an appropriate NEPA document. This firm is a recognized leader in the field of ski area design with a great deal of experience in shepherding projects through the NEPA process to approval and implementation. As most of the initial proposals for improvement that are listed in Phase 1 of the RMDP are located within the boundaries of the existing special use permit area and consist of projects that are essentially a continuation of things we have done a number of times since the resort opened in 1961, we felt that getting approval should be fairly simple. Essentially we are proposing the construction of 5 additional chair lifts and associated ski runs, the clearing of a limited amount of vegetation to improve glade skiing and the construction of several new skier service buildings. As we have demonstrated numerous times over the years that we are fully capable of making improvements of this nature with minimum impact to the environment, we felt that getting approval for the projects in the RMDP would not create a great deal of concern on the part of the Forest Service and other NEPA consulting agencies.

However, we are finding the path to approval to be anything but simple. From the start of the NEPA process we have experienced one delay after another largely due to requests

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for more detailed information of a technical nature from the various involved specialists. (See enclosed letter of 11/13/2000 on specialist input to the NEPA process. Sno.engineering rejected this approach as not meeting current requirements.) Costs have risen to several times original estimates with no end in sight. (Consulting fees are presently in excess of \$500,000.)

One of the concerns we have with NEPA is that the Forest Service and other involved agencies are not consistent in their requirements. Other ski areas in this general vicinity of the Northwest are able to gain approval for expansion programs considerably faster and with fewer complications than Brundage. We have been told that the chief reason for this is that Brundage is located in the Salmon River drainage where there are concerns with possible impacts to salmon and steelhead fisheries from ski area construction activities. The Forest Service has repeatedly told us that the U S Fish and Wildlife Service and the National Marine Fisheries Service would closely scrutinize our planned activities during the NEPA process. However, when Sno.engineering arranged an on-site tour of our proposals for Phase 1 of the RMDP for USFWS and NMFS personnel, we received little concern with our plans.

It should also be noted that in recent years a section of U S Highway 95 along the Little Salmon River downstream from Brundage has been undergoing extensive reconstruction work of a much greater magnitude than any ground disturbing activities proposed by Brundage. As this is a Federal highway, presumably the two Federal wildlife agencies were involved with approval of this work that has a far greater potential for impact to stream conditions than any of the proposed projects at Brundage. Consequently, we are inclined to believe that Forest Service concerns with USFWS and NMFS concerns with our expansion plans are somewhat exaggerated.

Another of our concerns is that the ski industry seems to be held to higher standards than other similar uses on National Forest lands. For instance, there are a number of electronic communication sites on the summit ridge of Brundage Mountain immediately adjacent to the ski area that, similar to the ski area, are authorized by special use permits. These sites have substantial improvements such as tall steel towers, permanent buildings and access roads—facilities not too much different than those on the adjacent ski area. The Forest Service has prepared a Communication Site Plan for this use and has done the necessary environmental analysis required by NEPA. This is quite a contrast from what is being required on the adjacent ski area where the operator is required to prepare his own site plan (the MDP) and conduct his own NEPA analysis, all at his own expense.

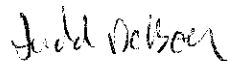
The Forest Service requires more in the way of planning and NEPA for skiing activities on national forest lands than is the case with other winter uses. For instance, the McCall area is fast becoming a Mecca for snowmobiling and in recent years the Payette National Forest has received a number of requests for staging areas, warming huts, guided touring operations, signing and a system of groomed routes for snowmobiling purposes. Snowmobilers freely roam off-trail over much of the Forest. These things are being done without the direction of an overall snowmobiling plan similar to an MDP required for ski areas. The Forest Service has been doing the NEPA work on a piecemeal basis for each

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parking lot, warming hut etc, rather than preparing one comprehensive NEPA document to cover the entire range of snowmobiling activities on the Forest. There is no charge to the snowmobiling community for this work. This is not consistent with the manner in which alpine skiing activities are handled.

We appreciate the opportunity to comment on this matter and look forward to improvements in the NEPA process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judd DeBoer".

Judd DeBoer, President
Brundage Mountain Company

Enclosure

CQ646

November 13, 2000

SE Group
PO Box 2729
Frisco, CO 80433

Dear Chris, John and Kent,

Reference our discussions on the level of detail necessary to meet NEPA requirements for each of the resource disciplines to be addressed in the EA for the Brundage Revised Master Development Plan.

We feel that it is essential that agreement be reached with the Forest Service on this matter before we proceed further with the EA. We are concerned that the EA does, indeed, meet Forest Service and NEPA requirements, yet does not become a costly and overblown exercise.

We have been giving considerable thought to this situation and it seems to us that the logical place to start would be to review recent NEPA documents that have been prepared for other projects in this general area. With this in mind, we have made copies of the soils and watershed sections of NEPA documents for several recent projects on the Payette and Boise National Forests as well as two other ski area expansion proposals. Several of these address projects that are located in the Little Salmon River drainage and, therefore, should generate much the same concerns as the Brundage RMDP. The other enclosed documents are being supplied as examples of the level of detail deemed appropriate by resource specialists in documents prepared by the Forest Service. We feel that collectively these documents should provide a close idea of the level of detail that is appropriate for the soils and watershed sections of the Brundage EA.

We welcome your reaction to this suggested approach.

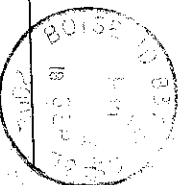
Sincerely,

Judd DeBoer, President
Brundage Mountain Company

Enclosures: Selected pages from Goose Creek Watershed Projects, Brown Creek Timber Sale, Fourmile Timber Sale, Clow Point Winter Recreation Parking Area, Lost Trail Ski Area Expansion, Anthony Lakes Mountain Resort and West Mountain North Projects

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